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Attorneys for Defendant
FACEBOOK, INC.

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION**

JOHN STOSSEL, an individual,

Plaintiff,

V.

FACEBOOK, INC., ET AL.

Defendants.

Case No. 5:21-cv-07385-VKD

**DECLARATION OF SONAL N.
MEHTA IN SUPPORT OF CIVIL
LOCAL RULE 6-2(A) STIPULATION**

1 I, Sonal N. Mehta, declare as follows:

2 1. I am a partner at Wilmer Cutler Pickering Hale and Dorr LLP. I represent Defendant
3 Facebook, Inc. (“Facebook”) in the above-captioned action.

4 2. Facebook has sought an enlargement of time to respond to Plaintiff’s Complaint.

5 3. On October 4, 2021, my colleague, Molly Jennings, emailed counsel for Plaintiff to
6 request Plaintiff’s agreement for an extension of time for Facebook’s response to the Complaint,
7 which, based on the alleged service date, would be due on October 21, 2021. Counsel for Plaintiff
8 agreed that Plaintiff would consent to an extension of time to respond up to and including November
9 30, 2021, and requested a reciprocal extension of time for Plaintiff to oppose any motion to dismiss
10 that may be filed. Counsel for Facebook and counsel for Plaintiff agreed to an extension of time up
11 to and including January 11, 2022 for Plaintiff to oppose any motion to dismiss, and for an extension
12 of time up to and including February 8, 2022 for Facebook to reply to Plaintiff’s opposition.

13 4. On October 13, 2021, my colleague, Molly Jennings, sent counsel for Plaintiff a draft
14 stipulation memorializing the November 30, 2021, January 11, 2022, and February 8, 2022 dates.

15 5. The time for Facebook to answer, move, or otherwise respond to the Complaint has
16 been enlarged once by stipulation filed concurrently herewith, from October 21 to November 30,
17 2021.

18 6. Facebook does not oppose Plaintiff’s request for an enlargement of time to January 8,
19 2022 to respond to any Rule 12 motions. Plaintiff does not oppose Facebook’s request for an
20 enlargement of time to February 8, 2022 to respond to Plaintiff’s opposition to any Rule 12 motions.

21 7. This proposed schedule is warranted because the winter holidays fall within the time
22 allotted for Plaintiff to prepare his opposition to any Rule 12 motion. Counsel for Plaintiff have also
23 represented that they will be preparing Plaintiff’s opposition brief concurrently with preparing for a
24 trial scheduled to begin on January 10, 2022. Accordingly, the proposed schedule will allow the
25 parties adequate time to study the issues and submit briefing that will aid the Court in its resolution
26 of any Rule 12 motions.

1 I declare under penalty of perjury that the foregoing is true and correct
2 Executed on this 14th day of October 2021 in Palo Alto, California.

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4 By: /s/ Sonal N. Mehta
5 SONAL N. MEHTA
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Attorney for Defendant
Facebook, Inc.